

WWR Ref. No. 06562552

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS (Eastern Division)**

ADVANCE PAYROLL FUNDING, LTD.,	)	CASE NO. 08 C 1072
	)	
Plaintiff,	)	
	)	
vs.	)	JUDGE MILTON I. SHADUR
	)	MAG. JUDGE ARLANDER KEYS
DURACO PRODUCTS, INC., etc.	)	
	)	
Defendant.	)	

---

**PLAINTIFF'S MOTION TO ENFORCE SETTLEMENT  
AGREEMENT AND ENTER STIPULATED JUDGMENT**

---

Now comes Plaintiff Advance Payroll Funding, Ltd., and hereby moves the Court to enforce the Settlement Agreement between Plaintiff and Defendant Duraco Products, Inc. dba Duraco Plastics; and for default of the agreement to enter the Stipulated Judgment for a sum that reflects all credits due. The Settlement Agreement, an affidavit of Plaintiff's Representative and a proposed Order reflecting the correct amount of the Final Judgment are attached hereto and incorporated herein by reference.

Respectfully submitted,

WELTMAN, WEINBERG & REIS CO., L.P.A.

/s/ Robert T. Kuehl

Robert T. Kuehl (Ill. Bar No. 6271281)

*Co-Counsel for Plaintiff*

180 LaSalle Street, Suite 2400

Chicago, IL 60601

Telephone: (312) 782-9676

Facsimile: (312) 782-4201

Email: [rkuehl@weltman.com](mailto:rkuehl@weltman.com)

Respectfully submitted,

WELTMAN, WEINBERG & REIS CO., L.P.A.

J. Charles Ruiz-Bueno (#0046806)  
*Pro Hac Vice/Lead Counsel for Plaintiff*  
Michael F. Schmitz (Ohio #0064842)  
*Pro Hac Vice/Co-Counsel for Plaintiff*  
Lakeside Place, Suite 200  
323 W. Lakeside Avenue  
Cleveland, OH 44113  
Telephone: (216) 685-1169  
Telephone: (216) 685-1106  
Facsimile: (216) 685-4345  
Email: [jruizbueno@weltman.com](mailto:jruizbueno@weltman.com)  
Email: [mschmitz@weltman.com](mailto:mschmitz@weltman.com)

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS (Eastern Division)**

ADVANCE PAYROLL FUNDING, LTD.,	)	CASE NO. 08 C 1072
	)	
Plaintiff,	)	
	)	
vs.	)	JUDGE MILTON I. SHADUR
	)	MAG. JUDGE ARLANDER KEYS
DURACO PRODUCTS, INC., etc.	)	
	)	
Defendant.	)	

---

**PROOF OF SERVICE OF  
PLAINTIFF'S MOTION TO ENFORCE SETTLEMENT AGREEMENT  
AND ENTER STIPULATED JUDGMENT**

---

I, Robert T. Kuehl, certify as follows under penalty of perjury this 24th day of June, 2008.

1. I filed *Plaintiff's Motion to Enforce Settlement Agreement and Enter Stipulated Judgment*, Plaintiff's Notice of Motion, Plaintiff's Notice of Presentment of Motion, and Plaintiff's Proposed Judgment and Order, by filing it with the clerk of court by electronic means.

2. I further caused copies of *Plaintiff's Motion to Enforce Settlement Agreement and Enter Stipulated Judgment*, Plaintiff's Notice of Motion, Plaintiff's Notice

of Presentment of Motion, and Plaintiff's Proposed Judgment and Order, to be served by regular mail, pursuant to Loc.R. 5.3(a)(2) and Fed.R.Civ.P. 5(b)(2)(C), to DURACO PRODUCTS, INC., dba DURACO PLASTICS, c/o agent C T Corporation System, at the agent's last known address of 208 S. LaSalle Street, Suite 814, Chicago, IL 60604.

3. I further caused copies of *Plaintiff's Motion to Enforce Settlement Agreement and Enter Stipulated Judgment*, Plaintiff's Notice of Motion, Plaintiff's Notice of Presentment of Motion, and Plaintiff's Proposed Judgment and Order, to be served by regular mail, pursuant to Loc.R. 5.3(a)(2) and Fed.R.Civ.P. 5(b)(2)(C), to DURACO PRODUCTS, INC., dba DURACO PLASTICS, at its last known address of 1109 East Lake Street, Streamwood, IL 60107-4395.

Respectfully submitted,

WELTMAN, WEINBERG & REIS CO., L.P.A.

/s/ J. Charles Ruiz-BUeno  
J. Charles Ruiz-Bueno (Oh. Bar No. 0046806)  
*Counsel Pro Hac Vice for Plaintiff*  
Lakeside Place, Suite 200  
323 W. Lakeside Avenue  
Cleveland, OH 44113  
Telephone: (216) 685-1169  
Telephone: (216) 685-1106  
Facsimile: (216) 685-4345  
Email: [jruizbueno@weltman.com](mailto:jruizbueno@weltman.com)

Robert T. Kuehl (Ill. Bar No. 6271281)  
*Attorney for Plaintiff*  
180 LaSalle Street, Suite 2400  
Chicago, IL 60601  
Telephone: (312) 782-9676  
Facsimile: (312) 782-4201  
E-mail: [rkuehl@weltman.com](mailto:rkuehl@weltman.com)